



State of New Jersey
Department of Environmental Protection

Richard J. Codey
Acting Governor

Bradley M. Campbell
Commissioner

Christopher Anderson
Director Environmental Affairs
L.E. Carpenter and Company
33587 Walker Road
Avon Lake, OH 44012

APR 06 2005

Re: L.E. Carpenter Superfund Site
Wharton Borough, Morris County, New Jersey

The New Jersey Department of Environmental Protection (NJDEP or Department) as well as the United States Environmental Protection Agency (USEPA) have completed a review of the report titled "2005 Monitored Natural Attenuation (MNA) (Monitoring Program Revision 2)" dated January 13, 2005. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). The NJDEP and the USEPA find the report to be acceptable provided the following comments are addressed.

General Comments:

This report outlined the revised sampling locations and the field and laboratory parameters for the MW-19/HS1 area only. It should be noted that the NJDEP and the USEPA require continued quarterly monitoring of this area.

LE has abandoned and sealed monitor wells in the other areas of the site so that excavation of impacted soil and groundwater can proceed. Once these activities are completed, LE will submit a revised monitoring program for review.

LE should note that TOC (total organic carbon) should be added to the lab analyte list (method 415.1) as the contaminants could be affected by high TOC.

Specific Comments, (USEPA):

It must be clarified that this should be considered an interim approach, not an approved remedial alternative or remedy. The USEPA is awaiting submission of the results from the MNA monitoring program. After the data from a few years of implementation has been reviewed, a decision can then be made to implement the MNA approach.

In order to implement MNA it will require a ROD Amendment, as MNA is considered to be a significant change from the current groundwater remedy outlined in the 1994 Record of Decision (ROD).

Should you have any questions please contact me at (609) 633-1416.

Sincerely,

Anthony Cinque, Case Manager
Bureau of Case Management



C: Jon Rheinhardt, Administrator/CFO, Borough of Wharton
Nick Clevett, RMT
Steven Cipot, USEPA
George Blyskun, BGWPA
John Prendergast, BEERA